

SHEA LARSEN

1731 Village Center Circle, Suite 150
Las Vegas, Nevada 89134
(702) 471-7432

James Patrick Shea, Esq.
Nevada Bar No. 405
Bart K. Larsen, Esq.
Nevada Bar No. 8538
Kyle M. Wyant, Esq.
Nevada Bar No. 14652

SHEA LARSEN

1731 Village Center Circle, Suite 150
Las Vegas, Nevada 89134
Telephone: (702) 471-7432
Fax: (702) 926-9683
E-Mail: jshea@shea.law
blarsen@shea.law

*Attorneys for HASElect-Medical Receivables
Litigation Finance Fund International SP*

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:

INFINITY CAPITAL MANAGEMENT,
INC.

Debtor.

Case No: 21-14486-ABL

Chapter 7

Date of Hearing: August 22, 2024

Time of Hearing: 9:30 a.m.

**Dial Information: (833) 435-1820;
meeting ID 161 110 6049; passcode
154251#**

**NOTICE OF HEARING ON MOTION TO ENFORCE COURT ORDERS
AND REQUIRE HEALTHPLUS IMAGING OF TEXAS, LLC AKA
HEALTHPLUS IMAGING, LLC TO REMIT PAYMENTS RELATING TO
ACCOUNTS RECEIVABLE**

NOTICE IS HEREBY GIVEN THAT HASElect-Medical Receivables Litigation Finance Fund International LP (“HASElect”), by and through its undersigned counsel, filed its *Motion to Enforce Court Orders and Require HealthPlus Imaging of Texas, LLC aka HealthPlus Imaging, LLC to Remit Payments Relating to Accounts Receivable* (the “Motion”) on July 17, 2024. The Motion seeks to enforce this Court’s prior orders with respect to various accounts receivable and collections thereon that are in possession of third parties.

NOTICE IS FURTHER GIVEN that a hearing on the Motion will be held before a United States Bankruptcy Court Judge on **August 22, 2024 at 9:30 a.m.** at the U.S. Bankruptcy

1 Court for the District of Nevada in the Foley Federal Building, 300 Las Vegas Blvd. South, Las
2 Vegas, Nevada 89101. The dial in information is as follows: Telephone Number: (833) 435-
3 1820; meeting ID 161 110 6049; passcode 154251.

4 **NOTICE IS FURTHER GIVEN** that any opposition to the Motion and the relief
5 requested therein must be filed and served in accordance with Local Rule 9014(d)(1), which
6 provides:

7 If you object to the relief requested, you *must* file a **WRITTEN** response to this pleading
8 with the court. You *must* also serve your written response on the person who sent you this
9 notice.

10 If you do not file a written response with the court, or if you do not serve your written
11 response on the person who sent you this notice, then:

- 12 • The court may *refuse to allow you to speak* at the scheduled hearing; and
- 13 • The court may rule *against you* without formally calling the matter at the hearing.

14 **PLEASE TAKE FURTHER NOTICE** that the hearing on the Motion may be
15 continued from time to time without further notice except for the announcement of any
16 adjourned dates and times at the above-noticed hearing or any adjournment thereof, and the court
17 may approve modifications at the hearing or any continued hearing.

18 DATED this 17th day of July, 2024.

19 **SHEA LARSEN**

20 /s/ Bart K. Larsen, Esq.

21 Bart K. Larsen, Esq.

22 Nevada Bar No. 8538

23 Kyle M. Wyant, Esq.

24 Nevada Bar No. 14652

25 1731 Village Center Circle, Suite 150

26 Las Vegas, Nevada 89134

27 *Attorneys for HASelect-Medical Receivables*
28 *Litigation Finance Fund International SP*

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CERTIFICATE OF SERVICE

1. On July 17, 2024, I served the following document(s): **NOTICE OF HEARING ON MOTION TO ENFORCE COURT ORDERS AND REQUIRE HEALTHPLUS IMAGING OF TEXAS, LLC AKA HEALTHPLUS IMAGING, LLC TO REMIT PAYMENTS RELATING TO ACCOUNTS RECEIVABLE**

2. I served the above document(s) by the following means to the persons as listed below:

☒ a. ECF System:

ROBERT E. ATKINSON

Robert@ch7.vegas, TrusteeECF@ch7.vegas; ecf.alert+atkinson@titlexi.com

CLARISSE L. CRISOSTOMO on behalf of Trustee ROBERT E. ATKINSON

clarisse@nv-lawfirm.com, bknotices@nv-lawfirm.com

BRADFORD IRELAN on behalf of Creditor HEALTHPLUS IMAGING OF TEXAS, LLC

birelan@imtxaslaw.com,

jstephens@imtxaslaw.com; dhall@imtxaslaw.com; ynguyen@imtxaslaw.com

DAVID MINCIN on behalf of Creditor HEALTHPLUS IMAGING OF TEXAS, LLC

dmincin@mincinlaw.com, cburke@mincinlaw.com

MICHAEL D. NAPOLI on behalf of Creditor TECUMSEH - INFINITY MEDICAL RECEIVABLES FUND, LP

michael.napoli@akerman.com,

cindy.ferguson@akerman.com; catherine.kretzschmar@akerman.com; masterdocketlit@akerman.com

TRENT L. RICHARDS on behalf of Creditor THE INJURY SPECIALISTS

trichards@sagebrushlawyers.com

ARIEL E. STERN on behalf of Creditor TECUMSEH - INFINITY MEDICAL RECEIVABLES FUND, LP

ariel.stern@akerman.com, akermanlas@akerman.com

U.S. TRUSTEE - LV - 7

USTPRegion17.LV.ECF@usdoj.gov

MATTHEW C. ZIRZOW on behalf of Debtor INFINITY CAPITAL MANAGEMENT, INC.

mzirzow@lzlawnv.com,

carey@lzlawnv.com; trish@lzlawnv.com; jennifer@lzlawnv.com; zirzow.matthewc.r99681@notify.bestcase.com

☒ b. United States mail, postage fully prepaid:

HEALTHPLUS IMAGING OF TEXAS, LLC AKA HEALTHPLUS IMAGING, LLC
9000 Southwest Freeway, Suite 260

SHEA LARSEN
1731 Village Center Circle, Suite 150
Las Vegas, Nevada 89134
(702) 471-7432

SHEA LARSEN

1731 Village Center Circle, Suite 150
Las Vegas, Nevada 89134
(702) 471-7432

Houston, TX 77074

STEPHANIE LAM
9707 Chipstead Circle
Spring, TX 77379

-and-

1 Signature Point Drive, Apt. 1707
League City, TX 77573

DIANE LAM
9707 Chipstead Circle
Spring, TX 77379

☐ c. Personal Service:

I personally delivered the document(s) to the persons at these addresses:

☐ For a party represented by an attorney, delivery was made by handing the document(s) at the attorney's office with a clerk or other person in charge, or if no one is in charge by leaving the document(s) in a conspicuous place in the office.

☐ For a party, delivery was made by handling the document(s) to the party or by leaving the document(s) at the person's dwelling house or usual place of abode with someone of suitable age and discretion residing there.

☐ d. By direct email (as opposed to through the ECF System): Based upon the written agreement of the parties to accept service by email or a court order, I caused the document(s) to be sent to the persons at the email addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐ e. By fax transmission:

Based upon the written agreement of the parties to accept service by fax transmission or a court order, I faxed the document(s) to the persons at the fax numbers listed below. No error was reported by the fax machine that I used. A copy of the record of the fax transmission is attached.

☐ f. By messenger:

I served the document(s) by placing them in an envelope or package addressed to the persons at the addresses listed below and providing them to a messenger for service.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 17, 2024.

By: /s/ Bart K. Larsen, Esq.